



GEORGIA M. PESTANA
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MARK D. ZUCKERMAN
Senior Counsel
E-mail: mzuckerm@law.nyc.gov
Phone: (212) 356-3519
Fax: (212) 788-9776

December 7, 2021

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Keith Boykin v. City of New York, 21 Civ. 1362 (AJN)

Your Honor:

I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I write jointly with plaintiff's counsel to respectfully request that discovery, as well as all corresponding deadlines in the Case Management Order, be stayed pending the outcome of the City's motion for judgment on the pleadings, which is now fully briefed. The City's motion, if fully granted, is fully dispositive of all claims in the case. Further, plaintiff's claims are for municipal liability, which will require substantial resources on the part of both sides to litigate. Thus, in the interest of judicial economy and preserving the parties' resources, both parties agree that it makes sense for the Court to rule on the City's motion, and then for discovery to be completed if the motion is denied.

SO ORDERED.
Alison J. Nathan
12/9/21

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman

Mark D. Zuckerman
Senior Counsel

cc: All Counsel (via ECF)